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To: [SitingBoard Filing \(DPU\)](#)
Subject: Solar Siting Comments
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Massachusetts Division of Energy Resources (DOER) found that over 85% of residents believe that the state should strive to site solar on rooftops, parking lots, landfills, and other developed lands, rather than continuing to clear forests and convert productive farmland. We can meet our energy needs without damaging our wetlands, forests, and other natural areas. Deforestation is one of the largest factors in climate change and has been causing climate changes impacting human societies for hundreds of years. Without any change in our siting policy, we could lose another 9,000 acres of largely forested lands in central and western Massachusetts.

Natural areas are essential for mitigating harms from climate disruption, biodiversity loss, and water cycle interference. According to Mass Audubon, the impacts of hundreds of ground-mount solar projects on our natural and working lands over the last decade have been broad and deep. Our current siting approach is more costly than protecting nature through 2050, Audubon says. Massachusetts has ample sites to locate affordable solar without incurring significant losses of natural and working lands. Over 40,000 acres could host highly cost-effective ground-mounted solar with very low impacts to natural and working lands. An additional 53,000 acres could site low-impact solar. Before ground-mount solar started to proliferate, 60% of our state was forested. Almost 10% of solar acres built during this past decade overlap with core wildlife habitat, and 11% overlap with critical natural landscapes identified by the state's map of lands supporting high levels of biodiversity.

Massachusetts has already committed to wildland reserves, and energy policy should reflect this commitment. We seek to avoid sites with high-carbon, high-biodiversity and farmland. Under the new clean energy law, local governments should be deeply involved in the creation of content for uniform sets of public health, safety, environmental and other standards, including zoning criteria required for the issuance of permits for small clean energy infrastructure facilities; a common standard application for small clean energy infrastructure facility projects; uniform pre-filing requirements for small clean energy infrastructure facilities; and requirements for public meetings, community outreach, and standards for site suitability.

Thank you.
Sincerely,
Dr. Jodi Rodar